

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

JENNER M. TORRENCE,)	
)	
Plaintiff,)	
)	No. 24-258
v.)	(Judge Katherine C. Davis)
)	
THE UNITED STATES,)	
)	
Defendant.)	

**DEFENDANT’S CONSENT MOTION FOR LEAVE TO FILE VIDEO
FOOTAGE AND PHOTOGRAPHS ON A PORTABLE DRIVE OR CD-ROM/DVD DISC**

Pursuant to Rule 7(b) of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully seeks leave to file video footage and photographs on a portable drive or CD-ROM/DVD disc. The video footage and photographs at issue were submitted on a portable drive by plaintiff, Jenner M. Torrence, with his application to the Air Force Board for the Correction of Military Records (AFBCMR) during the remand proceedings in this case.

Government counsel conferred on this motion with plaintiff’s counsel, Joseph D. Wilkinson II, and he advised Government counsel on June 17, 2025, that plaintiff consents to this motion.

The video footage and photographs at issue are part of the Administrative Record Part II that the United States filed on June 18, 2025 (ECF No. 26). Government counsel attempted to file record with the video footage and photographs embedded beginning following page 568 of the record, but the Court’s CM/ECF system did not allow her to upload the filing with that digital data embedded. Over the past week, Government counsel has attempted to conform the digital data for submission though the Court’s CM/ECF system, but the data degrades and/or pixilates and becomes inaccessible.

For the foregoing reasons, the United States respectfully requests the Court to grant this motion for leave to file the video footage and photographs that Mr. Torrence submitted to the AFBCMR on a portable drive or CD-ROM/DVD disc, so that the Court is able to access the digital as Mr. Torrence submitted it to the AFBCMR.

Respectfully submitted,

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